

TV **22**
KBSP

93-8
RECEIVED

MAR 24 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 4, 1993

Acting Chairman James Quello
Federal Communications Commission
Washington, DC 20554

Dear Chairman Quello:

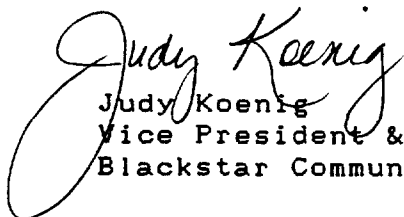
I am the General Manager of KBSP TV-22 which has broadcast the Home Shopping Club for the past six years. I am very concerned that my station may be denied must-carry status under the new cable reregulation law due to programming content. I feel this would be grossly inequitable and would place our station in an unfair competitive position in our market.

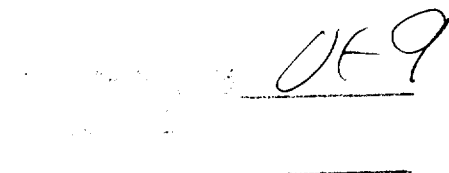
KBSP has consistently demonstrated our commitment to serve the public through our Community Affairs programming, our children's educational programming, our public service announcements and our involvement in non-broadcast areas in our community. The information provided in our Compliance Report clearly demonstrates our commitment to serving our community.

Channel 22 had financial difficulties from the time it went on the air in 1981 until 1987, when it became affiliated with the Home Shopping Club. Our affiliation with the Home Shopping Club has allowed us the opportunity to provide locally originated programming while remaining economically viable.

I hope you will agree that to allow "shopping" stations must-carry status is not a special privilege, but merely treating them equally with all other broadcasters. After reviewing our programming information I am certain that you will agree that our request is well warranted.

Cordially,


Judy Koenig
Vice President & General Manager
Blackstar Communications of Oregon, Inc.





BLACKSTAR COMMUNICATIONS OF OREGON, INC.
4923 Indian School Road, N.E., Salem, OR 97305 (503) 390-2202
FAX: 503-390-6829

EXPLANATION OF ANALYSIS PROCEDURES

THE STATIONS INCLUDED IN THE FOLLOWING ANALYSIS ARE:

KBSP	CHANNEL 22	INDEPENDENT/HOME SHOPPING CLUB
KEBN	CHANNEL 32	INDEPENDENT
KPDx	CHANNEL 49	INDEPENDENT/FOX AFFILIATE

TYPES OF PROGRAMMING LISTED IN THE FOLLOWING ANALYSIS ARE:

- LOCAL PROGRAMMING
- CHILDREN'S EDUCATIONAL PROGRAMMING
- MINORITY PROGRAMMING
- NEWS/PUBLIC AFFAIRS PROGRAMMING
- OTHER NON-ENTERTAINMENT PROGRAMMING SUCH AS ETHNIC AND /OR RELIGIOUS

THE ANALYSIS COVERS ONE WEEK'S PROGRAMMING: SATURDAY, SEPTEMBER 19, 1992 THROUGH FRIDAY, SEPTEMBER 25, 1992, 6:00 AM TO 12:00 MIDNIGHT.

SECTION 3 IS AN ANALYSIS OF KBSP'S PROGRAMMING AS COMPARED TO THE OTHER UHF INDEPENDENT STATIONS IN THE PORTLAND MARKET WITH THE EXCEPTION OF KNMT, CHANNEL 24. KNMT IS AFFILIATED WITH TRINITY BROADCASTING NETWORK AND IS A RELIGIOUS STATION. KNMT'S PROGRAMMING IS NOT LISTED IN THE TV GUIDE SO IT IS NOT INCLUDED.

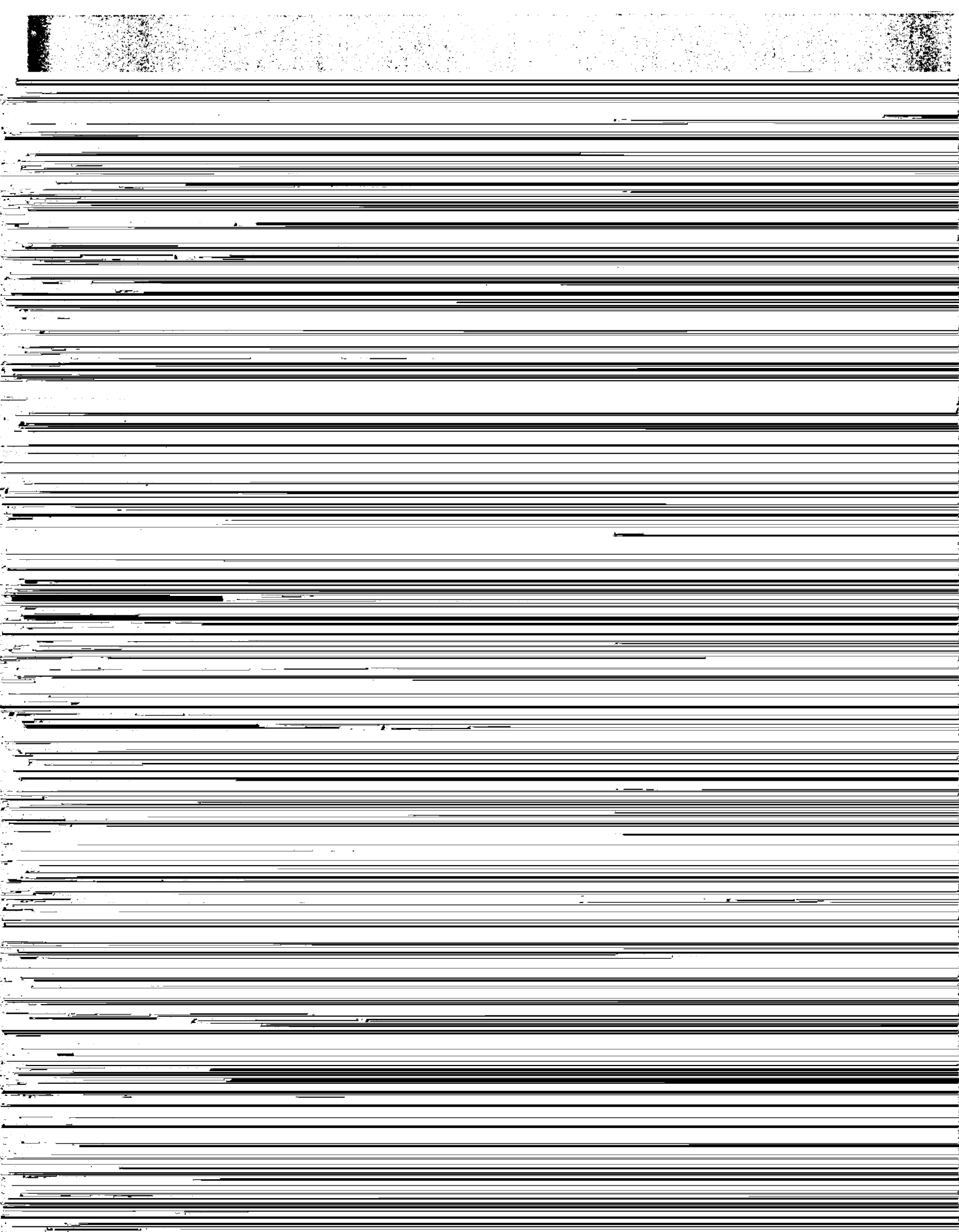
IN SECTION 5, EACH STATIONS PROGRAMMING IS LISTED FOR EACH DAY OF THE SURVEY WEEK. PROGRAMS ARE LISTED BY TITLE, TIME AIRED, DURATION, TYPE AND SOURCE (TO THE BEST OF OUR KNOWLEDGE). THE FOLLOWING DURATION SCALE WAS USED TO ALLOCATE PROGRAM DURATION TIME FOR ALL PROGRAMMING.

DURATION SCALE:

1/2 HOUR PROGRAM	=	24 MINUTES
1 HOUR PROGRAM	=	50 MINUTES
1 1/2 HOUR PROGRAM	=	76 MINUTES

IN SECTION 4, THE PROGRAMMING FOR EACH STATION IS LISTED BY TYPE OF PROGRAMMING: LOCAL, CHILDREN'S, MINORITY, NEWS/PUBLIC AFFAIRS AND OTHER PROGRAMMING. TOTAL TIME AND PERCENTAGES OF TOTAL OPERATION TIME ARE PROVIDED FOR EACH CATEGORY. TOTAL OPERATION TIME IS CALCULATED TO BE 7,560 MINUTES, BASED ON A SEVEN DAY PERIOD, 6:00 AM TO 12:00 MIDNIGHT.

IN SECTION 3, ALL THREE STATIONS ARE COMPARED AS TO THE TOTAL AMOUNT OF PROGRAMMING TIME PROVIDED IN THE FIVE CATEGORIES.



KBSP TV-22
SALEM, OREGON
PORTLAND ADI, #27

KBSP TV-22 IS LOCATED IN SALEM, OREGON AND SERVES THE PORTLAND ADI. ACCORDING TO THE ARBITRON TELEVISION UNIVERSE ESTIMATES SUMMARY, 1990-1991, THE PORTLAND ADI HAS 845,500 HOUSEHOLDS OF WHICH 814,900 ARE TV HOUSEHOLDS.

TV-22 HAS BEEN AFFILIATED WITH THE HOME SHOPPING NETWORK SINCE 1987. ACCORDING TO OUR OCTOBER 1992 REPORT FROM THE HOME SHOPPING NETWORK, KBSP TV-22 HAS 39,189 ACTIVE HOME SHOPPING MEMBERS IN OUR VIEWING AREA.

THERE ARE NINE TELEVISION STATIONS SERVING THE PORTLAND ADI.

KATU	CHANNEL 2	ABC AFFILIATE
KOIN	CHANNEL 6	CBS AFFILIATE
KGW	CHANNEL 8	NBC AFFILIATE
KOPB	CHANNEL 10	OREGON PUBLIC BROADCASTING
KPTV	CHANNEL 12	INDEPENDENT
KBSP	CHANNEL 22	INDEPENDENT/HOME SHOPPING CLUB
KNMT	CHANNEL 24	INDEPENDENT/TRINITY BROADCASTING
KEBN	CHANNEL 32	INDEPENDENT
KPDX	CHANNEL 49	INDEPENDENT/FOX AFFILIATE

KBSP HAS ALWAYS BEEN COMMITTED TO SERVING OUR LOCAL COMMUNITY. AS YOU WILL SEE IN THE FOLLOWING REPORTS, KBSP IS VERY ACTIVE IN PROVIDING LOCAL PUBLIC AFFAIRS PROGRAMMING.

KBSP HAS A FULL-TIME COMMUNITY AFFAIRS DIRECTOR WHO WORKS WITH LOCAL ORGANIZATIONS IN BRINGING CURRENT INFORMATION TO OUR VIEWERS. IN ADDITION TO OUR "IN YOUR INTEREST" PROGRAM SEGMENTS, WHICH ARE LISTED IN THE FOLLOWING REPORTS, KBSP ALSO PRODUCES AND BROADCASTS LOCAL PUBLIC SERVICE ANNOUNCEMENTS, WEEKLY UPDATES FROM THE OREGON EMPLOYMENT DIVISION, THE RED CROSS, THE YWCA IN ADDITION TO WORKING WITH THE LOCAL LAW ENFORCEMENT AGENCIES IN PROVIDING CRIME STOPPAGES AND OTHER COMMUNITY NEEDS.

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OVERVIEW OF KBSP TV-22 AND
THE PORTLAND MARKET

RECEIVED
MAY 22 1992
FCC MAIL ROOM

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EXPLANATION OF ANALYSIS
PROCEDURES

3

ANALYSIS OF KBSP'S PROGRAMMING
COMPARING IT TO THE OTHER UHF
INDEPENDENT STATIONS IN THE
PORTLAND MARKET.

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PROGRAM LISTINGS BY TYPE FOR
KBSP, KEBN AND KPDX.
TOTAL TIME FOR EACH TYPE AND
PERCENTAGE OF TOTAL OPERATION
TIME.

5

WEEKLY PROGRAM LISTINGS FOR
WEEK OF 9/19/92 - 9/25/92
FOR KBSP, KEBN AND KPDX

6

KBSP NON-BROADCAST EFFORTS
IN COMMUNITY/CHILDREN PROJECTS

7

AWARDS, PLAQUES AND LETTERS
RECEIVED BY KBSP

8

COPIES OF TV GUIDE ISSUE
DATED 9/19/92 - 9/25/92

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KBSP TV-22
PUBLIC INTEREST STANDARD
COMPLIANCE REPORT
1992

BLACKSTAR COMMUNICATIONS OF OREGON, INC.
4923 INDIAN SCHOOL ROAD, N.E.
SALEM, OREGON 97305
(503) 390-2202

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SEE ADDITIONAL BINDERS FOR KBSP TV-22 ISSUES/PROGRAMS QUARTERLY
REPORTS 1988 - 1992 AND CHILDREN'S QUARTERLY REPORTS 1992.

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KBSP IS AN ACTIVE PARTICIPANT IN HELPING TO IMPROVE OUR COMMUNITY THROUGH OUR PUBLIC AFFAIRS PROGRAMMING.

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Notes

SEE ADDITIONAL BINDERS FOR KBSP TV-22 ISSUES/PROGRAMS QUARTERLY
REPORTS 1988 - 1992 AND CHILDREN'S QUARTERLY REPORTS 1992.

PROGRAMMING IN THE PUBLIC INTEREST ON LOCAL LIFE INDEPENDENTS

Notes

KBSP TV-22 PROGRAMMING: YELLOW PAGES

KEBN TV-32 PROGRAMMING: PINK PAGES

KPDX TV-49 PROGRAMMING: GREEN PAGES

PROGRAM TYPES:

A AGRICULTURAL

CM COMMERCIAL MATTER

E ENTERTAINMENT

ED EDUCATIONAL

I INSTRUCTIONAL

IYI IN YOUR INTEREST/PUBLIC AFFAIRS

N NEWS

PA PUBLIC AFFAIRS

REL RELIGIOUS

S SPORTS

PROGRAM SOURCE:

S SYNDICATED

O OTHER/LOCAL

**SEE ADDITIONAL BINDERS FOR KBSP TV-22 ISSUES/PROGRAMS QUARTERLY
REPORTS 1988 - 1992 AND CHILDREN'S QUARTERLY REPORTS 1992.**

KBSP PROGRAMMING FOR THE WEEK OF SEPTEMBER 19 - 25, 1992

LOCAL PROGRAMMING:

9/19:	620AM	YWCA YOUTH WING	3:30	IYI
	820AM	SALEM DOWNTOWN ASSN.	4:30	IYI
	920AM	JUDICIAL ETHNIC-RACIAL	4:30	IYI
	1020AM	BOYS & GIRLS CLUB	4:00	IYI
	1120AM	MISSION MILL QUILT SHOW	4:30	IYI
	1220PM	BRIEF PAWS/PET NUTRITION	3:30	IYI
	120PM	OREGON ST. POLICE/DARE	4:00	IYI
	220PM	CCIS CHILDCARE/REFERRAL	3:00	IYI
	320PM	MISSION MILL QUILT SHOW	4:30	IYI
	420PM	DISCOVER RICE MONTH	4:30	IYI
	520PM	MIGRANT CENSUS 'B'	4:00	IYI
	620PM	TOKYO INT'L UNIVERSITY	4:00	IYI
	820PM	WOMEN'S CRISIS SERVICE	3:30	IYI
	920PM	JUDGE THORNTON/PRISON	4:00	IYI
	1020PM	BRIEF PAWS/5K CAT WALK	3:30	IYI
9/20:	720AM	NOAA WEATHER IN SALEM	4:30	IYI
	820AM	JUDICIAL ETHNIC-RACIAL	4:30	IYI
	120PM	SALEM AREA SENIORS	3:30	IYI
	220PM	1-5 WIDENING #1	4:30	IYI
	320PM	1-5 WIDENING #2	4:30	IYI
	520PM	DISCOVER RICE MONTH	4:30	IYI
	620PM	MISSION MILL QUILT SHOW	4:30	IYI
	720PM	SENIOR OUTREACH LIBRARY	4:30	IYI
	820PM	BACK TO SCHOOL SAFETY	4:30	ED
	920PM	CHEMEKETA JOB PLACEMENT	4:30	IYI
	1020PM	JUDGE THORNTON/PRISON	4:30	IYI
	1120PM	BRIEF PAWS/PET NUTRITION	3:30	IYI
9/21:	620AM	BRIEF PAWS/5K CAT WALK	3:30	IYI
	720AM	BACK TO SCHOOL SAFETY	4:30	ED
	820AM	DOWNTOWN GUIDES	4:30	IYI
	920AM	CCIS CHILDCARE #2	4:00	IYI
	1120AM	CHEMEKETA JOB PLACEMENT	4:30	IYI
	1220PM	JUDICIAL ETHNIC-RACIAL	4:30	IYI
	120PM	OR STATE POLICE/DARE	4:00	IYI
	220PM	MIGRANT CENSUS 'B'	4:00	IYI
	320PM	BRIEF PAWS/PET NUTRITION	3:30	IYI
	520PM	DISCOVER RICE MONTH	4:30	IYI
	620PM	CCIS CHILDCARE #1	4:30	IYI
	720PM	MISSION MILL QUILT SHOW	4:30	IYI
	820PM	BOYS & GIRLS CLUB/GRANT	4:00	IYI
	920PM	BRIEF PAWS/5K CAT WALK	3:30	IYI
	1120PM	SENIOR OUTREACH LIBRARY	4:30	IYI
9/22:	720AM	BRIEF PAWS/PET NUTRITION	3:30	IYI
	820AM	TEAM OR MOTORCYCLE SAFETY	4:30	IYI
	920AM	OR DOT/1-5 #2	4:30	IYI

KBSP PROGRAMMING FOR THE WEEK OF SEPTEMBER 19 - 25, 1992 CONTD.

	1020AM	MISSION MILL QUILT SHOW	4:30	IYI
	1220PM	CCIS CHILDCARE/#1	4:30	IYI
	120PM	DISCOVER RICE MONTH	4:30	IYI
	220PM	BRIEF PAWS/5K CAT WALK	3:30	IYI
	320PM	DOWNTOWN GUIDES	4:30	IYI
	420PM	JUDICIAL ETHNIC-RACIAL	4:30	IYI
	620PM	OR DOT/I-5 #2	4:30	IYI
	720PM	TEAM OR MOTORCYCLE SAFETY	4:30	IYI
	820PM	MISSION MILL QUILT SHOW	4:30	IYI
	920PM	CCIS CHILDCARE/#2	4:00	IYI
	1020PM	BRIEF PAWS/5K CAT WALK	3:30	IYI
	1120PM	JUDGE THORNTON/PRISON	4:00	IYI
9/23:	620AM	I-5 WIDENING #1	4:30	IYI
	720AM	MISSION MILL QUILT SHOW	4:30	IYI
	820AM	BRIEF PAWS/5K CAT WALK	3:30	IYI
	1020AM	KINTIGH HOLIDAY TREE	4:30	IYI
	1120AM	ESS OREGON HISTORY BOOK	4:30	IYI
	1220PM	I-5 WIDENING #2	4:30	IYI
	120PM	BACK TO SCHOOL SAFETY	4:30	ED
	220PM	BRIEF PAWS/PET NUTRITION	3:30	IYI
	420PM	MISSION MILL QUILT SHOW	4:30	IYI
	520PM	CCIS CHILDCARE/#2	4:30	IYI
	620PM	TEAM OR MOTORCYCLE SAFETY	4:30	IYI
	720PM	FOOD STAMPS IN OREGON	4:00	IYI
	820PM	DOWNTOWN ASSN.	4:30	IYI
	920PM	BRIEF PAWS/5K CAT WALK	3:30	IYI
	1020PM	JUDICIAL ETHNIC-RACIAL	4:30	IYI
9/24:	620AM	BRIEF PAWS/PET NUTRITION	3:30	IYI
	720AM	ADOPT A RIVER BILL	4:30	IYI
	920AM	MISSION MILL QUILT SHOW	4:30	IYI
	1020AM	SENIOR OUTREACH LIBRARY	4:30	IYI
	1120AM	KINTIGH HOLIDAY TREE	4:30	IYI
	1220PM	FSS OR. HISTORY BOOK	4:30	IYI

KBSP PROGRAMMING FOR THE WEEK OF SEPTEMBER 19 - 25, 1992 CONTD.

1120AM	1-5 WIDENING #2	4:30	IYI
1220PM	KINTIGH HOLIDAY TREE	4:30	IYI
220PM	WOMEN'S CRISIS SERVICE #1	3:30	IYI
320PM	BRIEF PAWS/5K CAT WALK	3:30	IYI
420PM	MARION CO., FIRE/GUS/EXIT	3:00	ED
520PM	DOWNTOWN ASSN.	4:30	IYI
620PM	MISSION MILL QUILT SHOW	4:30	IYI
720PM	BRIEF PAWS/5K CAT WALK	3:30	IYI
920PM	TEAM OR. MOTORCYCLE SAFETY	4:30	IYI
1020PM	WOMEN'S CRISIS SERVICE #2	3:30	IYI
1120PM	ESS OREGON HISTORY BOOK	4:30	IYI

THESE FIGURES ARE INCLUDED IN NEWS & PUBLIC AFFAIRS AND
CHILDRENS EDUCATIONAL PROGRAMMING

LOCAL PROGRAMMING TOTAL: 424 1/2 MINUTES
(5.6%)

CHILDREN'S EDUCATIONAL PROGRAMMING:

9/20:	10AM	CARRASCOLENDAS	24 MIN.	ED
	1030AM	VEGETABLE SOUP	24 MIN.	ED
	820PM	BACK TO SCHOOL SAFETY	4:30	ED
9/21:	720AM	BACK TO SCHOOL SAFETY	4:30	ED
9/23:	120PM	BACK TO SCHOOL SAFETY	4:30	ED
9/25:	620AM	BACK TO SCHOOL SAFETY	4:30	ED
	420PM	MARION CO. FIRE/GUS/EXIT	3:00	ED

CHILDREN'S EDUCATIONAL PROGRAMMING TOTAL: 69 MINUTES
(.9%)

MINORITY PROGRAMMING:

IS INCLUDED IN NEWS AND PUBLIC AFFAIRS

NEWS & PUBLIC AFFAIRS PROGRAMMING:

9/19:	620AM	YWCA YOUTH WING	3:30	IYI
	820AM	SALEM DOWNTOWN ASSN.	4:30	IYI
	920AM	JUDICIAL ETHNIC-RACIAL	4:30	IYI
	1020AM	BOYS & GIRLS CLUB	4:00	IYI
	1120AM	MISSION MILL QUILT SHOW	4:30	IYI
	1220PM	BRIEF PAWS/PET NUTRITION	3:30	IYI
	120PM	OREGON ST. POLICE/DARE	4:00	IYI
	220PM	CCIS CHILDCARE/REFERRAL	3:00	IYI

KBSP PROGRAMMING FOR THE WEEK OF SEPTEMBER 19 - 25, 1992 CONTD.

	320PM	MISSION MILL QUILT SHOW	4:30	IYI
	420PM	DISCOVER RICE MONTH	4:30	IYI
	520PM	MIGRANT CENSUS 'B'	4:00	IYI
	620PM	TOKYO INT'L UNIVERSITY	4:00	IYI
	820PM	WOMEN'S CRISIS SERVICE	3:30	IYI
	920PM	JUDGE THORNTON/PRISON	4:00	IYI
	1020PM	BRIEF PAWS/5K CAT WALK	3:30	IYI
9/20:	720AM	NOAA WEATHER IN SALEM	4:30	IYI
	820AM	JUDICIAL ETHNIC-RACIAL	4:30	IYI
	120PM	SALEM AREA SENIORS	3:30	IYI
	220PM	I-5 WIDENING #1	4:30	IYI
	320PM	I-5 WIDENING #2	4:30	IYI
	520PM	DISCOVER RICE MONTH	4:30	IYI
	620PM	MISSION MILL QUILT SHOW	4:30	IYI
	720PM	SENIOR OUTREACH LIBRARY	4:30	IYI
	920PM	CHEMEKETA JOB PLACEMENT	4:30	IYI
	1020PM	JUDGE THORNTON/PRISON	4:30	IYI
	1120PM	BRIEF PAWS/PET NUTRITION	3:30	IYI

KBSP PROGRAMMING FOR THE WEEK OF SEPTEMBER 19 - 25, 1992 CONTD.

	1120PM	JUDGE THORNTON/PRISON	4:00	IYI
9/23:	620AM	1-5 WIDENING #1	4:30	IYI
	720AM	MISSION MILL DIRT SHOW	4:30	IYI

KBSP PROGRAMMING FOR THE WEEK OF SEPTEMBER 19 - 25, 1992 CONTD.

OTHER PROGRAMMING: (RELIGIOUS)

9/20: 9AM JIMMY SWAGGART 50 MIN. REL

OTHER PROGRAMMING TOTAL: 50 MINUTES
 (.7%)

PROGRAM INFORMATION BASED ON ACTUAL PROGRAM LOGS

KEBN PROGRAMMING FOR THE WEEK OF SEPTEMBER 19 - 25 1992

LOCAL PROGRAMMING:
NONE

CHILDREN'S EDUCATIONAL PROGRAMMING:
9/21: 130PM PET PLAYHOUSE 24 MIN. ED.

CHILDREN'S EDUCATIONAL PROGRAMMING TOTAL: 24 MINUTES
(.3%)

MINORITY PROGRAMMING:
NONE

NEWS & PUBLIC AFFAIRS PROGRAMMING:
9/19: 11AM AMERICA'S BACKYARD 24 MIN. PA
9/20: 1PM WORKING WOMEN 24 MIN. PA
9/21: 9PM HOMENET NEWS 24 MIN. N.
9/22: 130PM ANIMAL CLINIC 24 MIN. PA
9PM HOMENET NEWS 24 MIN. N.
9/23: 9PM HOMENET NEWS 24 MIN. N.
9/24: 9PM HOMENET NEWS 24 MIN. N.
9/25: 130PM IMAGES 24 MIN. PA
9PM HOMENET NEWS 24 MIN. N.

NEWS & PUBLIC AFFAIRS PROGRAMMING TOTAL: 216 MINUTES
(2.9%)

OTHER PROGRAMMING: (RELIGIOUS)
9/20: 8AM CHRISTIAN EVANGELISM 50 MIN. REL.
9AM AMERICAN REL. TOWNHALL 24 MIN. REL.
930AM AMAZING FACTS 24 MIN. REL.
10AM ZOLA LEVITT 24 MIN. REL.
4PM LIVING WORD 24 MIN. REL.
1030PM AMERICAN REL. TOWNHALL 24 MIN. REL.
11PM FATIMA 24 MIN. REL.
1130PM JACK VAN IMPE 24 MIN. REL.
9/21: 10AM 700 CLUB 50 MIN. REL.
11AM CHRISTIAN EVANGELISM 50 MIN. REL.
12N COPE 50 MIN. REL.
2PM ANOTHER LIFE 24 MIN. REL.
9/22: 10AM 700 CLUB 50 MIN. REL.
11AM CHRISTIAN EVANGELISM 50 MIN. REL.
12N COPE 50 MIN. REL.
2PM ANOTHER LIFE 24 MIN. REL.

KEBN PROGRAMMING FOR THE WEEK OF SEPTEMBER 19 - 25, 1992 CONTD.

9/23:	10AM	700 CLUB	50 MIN.	REL.
	11AM	CHRISTIAN EVANGELISM	50 MIN.	REL.
	12N	COPE	50 MIN.	REL.
	2PM	ANOTHER LIFE	24 MIN.	REL.
9/24:	10AM	700 CLUB	50 MIN.	REL.
	11AM	CHRISTIAN EVANGELISM	50 MIN.	REL.
	12N	COPE	50 MIN.	REL.
	2PM	ANOTHER LIFE	24 MIN.	REL.
9/25:	10AM	700 CLUB	50 MIN.	REL.
	11AM	CHRISTIAN EVANGELISM	50 MIN.	REL.
	12N	COPE	50 MIN.	REL.
	2PM	ANOTHER LIFE	24 MIN.	REL.

OTHER PROGRAMMING TOTAL: 1088 MINUTES
(14.4%)

PROGRAM INFORMATION WAS DERIVED FROM THE TV GUIDE ISSUE DATED
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